

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

RYAN BRESLOW, et al.,

Plaintiffs,

v.

MARK PHILLIPS, et al.,

Defendants.

DECLARATION OF DANIEL COUGHLIN

I, Daniel Coughlin, declare as follows:

1. I am over the age of eighteen and am competent to testify as to the matters herein.

The following is based on personal knowledge unless otherwise noted.

2. I am the Director of Data Insights, Systems, and Architecture for the International Rescue Committee (“IRC”).

3. Shortly after the Russia-Ukraine war began, Mark Phillips (“Phillips”) told me about the project he was working on, Movement DAO (“Movement”). Phillips explained that Movement was a new decentralized autonomous organization (“DAO”) that would provide for the funding of social movements through blockchain technology and the formation of other DAOs.

4. Phillips contacted me to see if there were any potential synergies between the work he was doing at Movement and IRC, which conducts humanitarian aid operations in Ukraine. Specifically, Phillips and I discussed the Peace DAO, a DAO organized under Movement’s

umbrella that was raising funds for humanitarian efforts in Ukraine.

5. I understand that Movement's community operates a Discord channel where members of the community discuss Movement's governance and operations. I also understand that participants in the Peace DAO community had weekly Discord meetings. I attended two or three of these meetings so that I could provide insights on what was going on in Ukraine based on my work with IRC to aid the Peace DAO's efforts. Ryan Breslow participated in at least one of these meetings.

I, Daniel Coughlin, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York, March 17, 2023

DocuSigned by:

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Daniel Coughlin